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June 12, 2008

Mr. Joe Yun
California Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, California 94236-0001

Dear Mr. Yun:

Subject: Proposition 84 Integrated Regional Water Management and
Proposition 1E Stormwater-Flood Management Guideline Development

The Los Angeles Department of Water and Power (LADWP) is writing in response to your solicitation of comments regarding the development of Proposition 84 Integrated Regional Water Management (IRWM) and Proposition 1E Stormwater-Flood Management grant guidelines.

LADWP supplies water to more than four million residents and businesses in the City of Los Angeles. We recently released "Securing L.A.'s Water Supply," a blueprint for creating sustainable sources of water for the future of Los Angeles. This plan calls for the City to meet all new demand for water through a combination of water conservation and water recycling by 2030, which is about 100,000 acre-feet per year.

To meet our goals, we are investing in our own facilities as well as working together with other parties in our region. We recognize that many water solutions require regional coordination and investment and view IRWM as a powerful tool to improve water management. We have been very actively involved in the development of the Greater Los Angeles County Integrated Regional Water Management Plan (IRWMP) and we are committed to its effective implementation. Based on the recent California Department of Water Resources (DWR) public workshops on IRWM and the Stormwater-Flood Management program, we would like to provide the following input to the development of both the programs' guidelines:

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- **The Proposition 84 IRWM guidelines should clearly outline the criteria for what constitutes a region.** DWR needs to determine clear and concise criteria for what constitutes a region, which fulfills the long-term planning and implementation intentions of the IRWM program. The criteria should be explicitly defined in the IRWM guidelines.

DWR's current proposal to conduct a "region assessment" where all regions, including existing and new, would have to apply to be considered as an official planning region will likely encourage larger groups to split up and apply separately. This could undermine and significantly set back progress made to date. In the Los Angeles area, in particular, DWR strongly suggested that five separate efforts come together to create one plan. The proposed region assessment would open the door for sub-regions to go their own way, which would effectively disintegrate our region.

- **Projects should be ranked for IRWM funding and Stormwater-Flood funding against separate and unique criteria.** Projects may be eligible and competitive for both sources of funding, but may rank differently against the criteria for each source. This would allow for projects to be funded by the funding sources that DWR determines to be best based on the criteria. If DWR requires one priority project list from an IRWMP region, it would not allow for projects to be ranked based on the different criteria. Therefore, the application should allow for each project to indicate one or both sources of funding for which it is applying.
- **The Proposition 1E Stormwater-Flood Management guidelines should aim to fund projects that manage stormwater runoff to reduce flood damage and where feasible, provide other benefits, including groundwater recharge, water quality improvement, and ecosystem restoration.** LADWP is involved in several projects that are great examples of stormwater-flood management projects including the Los Angeles County Flood Control Big Tujunga Dam Rehabilitation Project.

Thank you for this opportunity to submit comments in regard to the development of the Proposition 84 IRWM and Proposition 1E Stormwater-Flood grant programs guidelines. We look forward to working with you as this process moves forward.

Mr. Joe Yun
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If you have any questions, please contact Mr. Andy Niknafs of my staff at (213) 367-2354.

Sincerely,

A handwritten signature in black ink, appearing to read "James B. McDaniel" with a stylized flourish underneath.

James B. McDaniel
Senior Assistant General Manager-
Water System

HHH:jmm

c: Mr. John Woodling, DWR
Mr. Mark Cowin, DWR
Ms. Tracie Billington, DWR
Mr. Mark Stuart, DWR
Mr. Andy Niknafs, LADWP